

8/15/06

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,) CRIM. NO. 04-30032-MAP
)
 vs.)
)
 FRANCIS G. KEOUGH,)
)
 Defendant.)

DOCKETED

FINAL JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(C)

The United States of America, by and through Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William M. Welch II, Assistant United States Attorney, hereby files this final joint memorandum pursuant to Local Rule 116.5(C) and the Magistrate Judge's Scheduling Order.

1. There are no outstanding discovery issues not yet presented or resolved.
2. The parties do not anticipate providing additional discovery.
3. The defendant does not intend to raise a defense of insanity or public authority.
4. The Government has not requested notice of alibi. However, the defendant does not intend to raise a defense of alibi to the current charge.
5. The defendant intends to file motions to sever, dismiss, and suppress, and possibly other substantive motions

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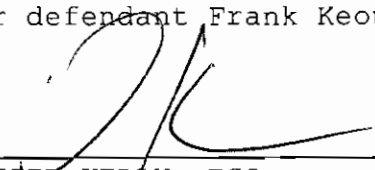
Filed this 15th day of August, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/ William M. Welch II
WILLIAM M. WELCH II
Assistant United States Attorney

For defendant Frank Keough:

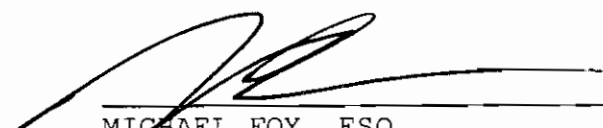


DANIEL KELLY, ESQ.

For defendant Angel Guzman:

LORI LEVINSON, ESQ.

For defendant Michael Hallahan:



MICHAEL FOY, ESQ.

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
August 15, 2006

I, William M. Welch, Assistant U.S. Attorney, do hereby
certify that I have served a copy of the foregoing by fax upon:

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/s/ William M. Welch II
WILLIAM M. WELCH II
Assistant United States Attorney